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450 Lexington Avenue  
New York, New York, 10017

*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SCOTT STERLING, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS,  
BELINDA NUCIFORA, DAVID  
BARTHOLOMEW, CHRISTOPHER  
GUZOWSKI, and MICHAEL ALFRED,

Defendants.

Civil Action No.: 2:22-cv-07273-JMV-MAH

*Document Electronically Filed*

**DECLARATION OF  
MARI GRACE BYRNE, ESQ. IN  
SUPPORT OF APPLICATION FOR  
ADMISSION *PRO HAC VICE***

I, **MARI GRACE BYRNE, ESQ.**, of full age, make this application to appear as counsel *pro hac vice* in the above-captioned action, and declare as follows:

1. I am a Partner in the law firm of Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017. I am fully familiar with the facts and circumstances surrounding this litigation, and I submit this Declaration in support of the application for my admission *pro hac vice* pursuant to Local Civil Rule 101.1(c)(3).

2. My law firm has been retained as counsel for Defendants Iris Energy Limited, Daniel Roberts, William Roberts, Belinda Nucifora, David Bartholomew, Christopher Guzowski, and Michael Alfred (collectively, "Defendants") in this litigation. The issues raised in this litigation involve areas with which I have experience in the law.

3. Attached hereto as Exhibit A is a true and correct table that identifies, to the best of my knowledge, my bar admissions, the year in which I was admitted to each bar, and, for each bar, the name and address of the official or office maintaining the roll of its members.

4. I am not under suspension or disbarment by any court and have never been subjected to any disciplinary action by any court or governing body.

5. I am ineligible for plenary admission to the bar of this Court pursuant to Local Civil Rule 101.1(b).

6. I am willing to submit to the jurisdiction of this Court and to comply with all of its rules and procedures. To ensure my familiarity with these regulations I have reviewed the local rules of this Court.

7. I have never been convicted of a felony crime, censured, suspended, disciplined, or disbarred by any court, nor are there any disciplinary or contempt proceedings involving me pending before any court, nor have I been denied admission to any court during the last five years.

8. I agree to abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Code of Professional Responsibility.

9. Pursuant to the rules of this Court, Samuel I. Portnoy, Esq., or another member of the law firm Gibbons P.C., who is a member in good standing of the bars for the State of New Jersey and the United States District Court for the District of New Jersey, will review and sign all

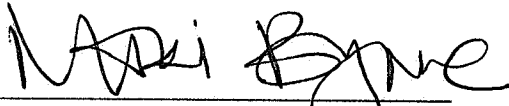
pleadings, briefs, and other papers filed with the Court on behalf of Defendants, and will be present for all appearances before the Court unless previously excused from appearing by the Court.

10. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial or other proceedings, to submit to the jurisdiction of this Court for the purposes of sanctions, discipline, or other such action as the Court may deem proper, and to otherwise abide by all the terms and conditions of Local Civil Rule 101.1(c).

11. Pursuant to Local Civil Rule 101.1(c)(2), I agree to pay, or cause to be paid, the annual fee required by the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and as directed by the Trustees of the Fund. I further agree that, pursuant to Local Civil Rule 101.1(c)(3), I shall pay, or cause to be paid, \$150.00 to the Clerk of the United States District Court for the District of New Jersey.

12. In light of the foregoing, I respectfully request on behalf of Defendants that I be admitted *pro hac vice* for the purpose of representing them in this matter in association with Gibbons P.C.

I declare under penalty of perjury that the foregoing is true and accurate. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
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Mari Grace Byrne, Esq.

Dated: January 20, 2023

# **EXHIBIT A**

**Bar Admissions**

<b>Bar</b>	<b>Year of Admission</b>	<b>Name and Address of the Official or Office Maintaining the Bar's Roll</b>
State of New York	2012	New York State Supreme Court Appellate Division, First Department 27 Madison Avenue New York, NY 10010
U.S. District Court, E.D. New York	2014	Clerk of Court United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201
U.S. District Court, S.D. New York	2014	Clerk of Court United States District Court 500 Pearl Street, New York, NY 10007, Attention: Attorney Services
U.S. District Court, N.D. Illinois	2021	Clerk of Court United States District Court Northern District of Illinois 219 S. Dearborn Street, Room 2050 Chicago, IL 60604
U.S. Court of Appeals, Third Circuit	2020	Office of the Clerk United States Court of Appeals for the Third Circuit 21400 U.S. Courthouse 601 Market Street Philadelphia, PA 19106-1790